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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,

13 v.

14 ANGEL FELIX JR.,
15 Defendant.
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CASE NO. 2:22-CR-00027-TLN

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL
ACT; FINDINGS AND ORDER

DATE: September 1, 2022

TIME: 9:30 a.m.

COURT: Hon. Troy L. Nunley

17 **STIPULATION**

18 Plaintiff United States of America, by and through its counsel of record, and
19 defendant, by and through defendant's counsel of record, hereby stipulate as follows:

20 1. By previous order, this matter was set for status on September 1, 2022.

21 2. By this stipulation, defendant now moves to continue the status conference
22 until October 20, 2022 at 9:30 a.m., and to exclude time between September 1, 2022, and
23 October 20, 2022, under Local Code T4.

24 3. The parties agree and stipulate, and request that the Court find the
25 following:

26 a) The government has represented that the discovery associated with
27 this case includes law enforcement reports and audio recordings. All of this
28 discovery has been either produced directly to counsel and/or made available for

1 inspection and copying.

2 b) Counsel for defendant desires additional time consult with his client,
3 review the current charges, conduct investigation and research related to the
4 charges, and otherwise prepare for trial.

5 c) Counsel for defendant believes that failure to grant the above-
6 requested continuance would deny him/her the reasonable time necessary for
7 effective preparation, taking into account the exercise of due diligence.

8 d) The government does not object to the continuance.

9 e) Based on the above-stated findings, the ends of justice served by
10 continuing the case as requested outweigh the interest of the public and the
11 defendant in a trial within the original date prescribed by the Speedy Trial Act.

12 f) For the purpose of computing time under the Speedy Trial Act, 18
13 U.S.C. § 3161, et seq., within which trial must commence, the time period of
14 September 1, 2022 to October 20, 2022, inclusive, is deemed excludable pursuant to
15 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a
16 continuance granted by the Court at defendant's request on the basis of the Court's
17 finding that the ends of justice served by taking such action outweigh the best
18 interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: August 29, 2022

PHILLIP A. TALBERT
United States Attorney

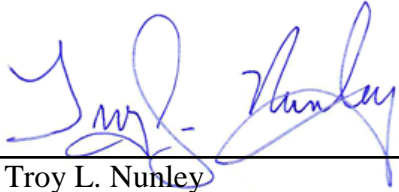
/s/ JUSTIN L. LEE
JUSTIN L. LEE
Assistant United States Attorney

Dated: August 29, 2022

/s/ CLEMENTE JIMENEZ
CLEMENTE JIMENEZ
Counsel for Defendant
ANGEL FELIX Jr.

ORDER

IT IS SO FOUND AND ORDERED this 29th day of August, 2022.


Troy L. Nunley
United States District Judge